

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

R. DANIEL BRADY ET AL.,)	
)	
Plaintiffs,)	
)	Civil Action No. 5:09-CV-00449-BO
v.)	
)	
XE SERVICES LLC ET AL.,)	
)	
Defendants.)	
_____)	

**CORPORATE DEFENDANTS’ MOTION TO SUBSTITUTE THE UNITED STATES
IN PLACE OF CORPORATE DEFENDANTS PURSUANT TO THE WESTFALL ACT**

Defendants Xe Services LLC, Blackwater Security Consulting LLC, U.S. Training Center, Inc., Raven Development Group LLC, GSD Manufacturing LLC, Prince Group, LLC, Total Intelligence Solutions LLC, Greystone Limited a/k/a Greystone Ltd., Terrorism Research Center, Incorporated, Technical Defense Associates, Incorporated, Aviation Worldwide Services, LLC, Guardian Flight Systems LLC, Presidential Airways, Inc., STI Aviation, Inc., Air Quest, Inc., Samarus Co. Ltd., and Erik Prince (collectively, the “Corporate Defendants”) hereby petition this Court to certify pursuant to the Westfall Act, 28 U.S.C. § 2679(d)(3), that the Corporate Defendants were “employee[s] of the Government . . . acting within the scope of [their] . . . employment” when the events giving rise to the above-captioned action occurred and, accordingly, to order that the United States “be substituted as the party defendant” in place of all of the Corporate Defendants.

The reasons that this motion should be granted are set forth in the accompanying Memorandum of Law, filed concurrently herewith.

Dated: April 7, 2010

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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In addition, I hereby certify that, pursuant to 28 U.S.C. § 2679(d)(3) and Federal Rule of Civil Procedure 4(i)(1) (previously Federal Rule of Civil Procedure 4(d)(4)), I served the foregoing by certified mail to each of the following:

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